

**UNITED STATES COURT FOR THE 5TH CIRCUIT IN THE NORTHERN DISTRICT OF  
MISSISSIPPI.**

ZORRI N. RUSH

V.

1:19CV020-SA-RP

EUPORA FAMILY MEDICAL CLINIC

**CIVIL COMPLAINT**

**I. PARTIES TO COMPLAINT**

A. PLAINTIFF- Zorri N. Rush  
6912 Mount Vernon Rd  
Eupora, MS 39744  
6627531249  
[zorrirush@hotmail.com](mailto:zorrirush@hotmail.com)

B. DEFENDANT- Eupora Family Medical Center  
1301 Veterans Memorial Blvd,  
Eupora, MS 39744  
662-258-7200

**II. JURISDICTION**

Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Defendants in this case are charged with denying services to an individual with disabilities in violation of the Americans with Disabilities acts.. The amount in controversy exceeds \$75,000.

**III. STATEMENT OF CLAIM**

Defendant employs Jewell Huffman III, MD who discharged plaintiff in this case for reasons related to mental and physical disabilities. The defendants did so in a medical capacity that prevented medical care and disrupted treatment plans for chronic lifelong health concerns. Defendant admit cause of action (discharge) was related to disabilities.

**IV. RELIEF**

A. Issue a summons directing the defendants to appear before the court.

- B. Order the defendant to submit a certified copy of the transcript and record, including evidence upon which the findings and decision to discharge patient are based.
- C. Grant any further relief as may be just and proper under the circumstances of this case.

*Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11. I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.*

**Date of signing:** the 16th day January 2019

**Signature of Plaintiff**

**Printed Name of Plaintiff**

Zorri N. Rush

Zorri N. Rush  
6912 Mount Vernon Rd  
Rogers, MS 39744

MISSISSIPPI  
JAN 23 2019



X-RAYED

U.S. Clerk  
911 Jackson Ave  
#369  
Oxford, MS 38655

96655-362294

